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17
18 UNITED STATES DISTRICT COURT
19
20 DISTRICT OF NEVADA

21 JPMORGAN CHASE BANK, N.A., a
22 national banking association,

23 Plaintiff,

24 vs.

25 SFR INVESTMENTS POOL 1, LLC, a
26 Nevada limited liability company; THE
27 WILLOWS HOMEOWNERS'
28 ASSOCIATION, a Nevada non-profit
corporation; DANIEL A. RICHARD, an
individual,

Defendants.

Case No. 2:17-CV-00324-GMN-PAL

**STIPULATION AND ORDER TO
EXTEND SCHEDULING ORDER
DEADLINES BY 30 DAYS**

(First Request)

1 SFR INVESTMENTS POOL 1, LLC, a
2 Nevada limited liability company,

3 Counterclaimant/Cross-Claimant,

4 vs.

5 JPMORGAN CHASE BANK, N.A.;
6 DANIEL A. RICHARD, an individual,

7 Counter-Defendant/Cross-Defendants.

8 Pursuant to LR IA 6-1 and LR 26-4, Plaintiff/Counter-Defendant JPMorgan
9 Chase Bank, N.A. (“Chase”), Defendant/Counterclaimant/Cross-Claimant SFR
10 Investments Pool 1, LLC (“SFR”), and The Willows Homeowners Association
11 (“Willows”), by and through their respective counsel of record, stipulate and request
12 that this Court extend discovery and dispositive motion deadlines in the above-
13 captioned case for 30 days, to permit the parties to efficiently complete party
14 depositions and outstanding written discovery. The parties have conferred and agree
15 that this brief extension is the most reasonable, most economical, and least
16 burdensome way to complete discovery in this case.

17 This is the parties’ first request for an extension to the scheduling order
18 deadlines, which were submitted in compliance with LR 26-1. The parties make this
19 request in good faith and not for purposes of delay.

20 **I. Discovery Completed to Date**

21 To date, Chase has served the following discovery: initial disclosures; initial
22 expert disclosure; requests for production to SFR; interrogatories to SFR; notice of
23 Rule 30(b)(6) deposition of SFR; requests for production to Willows; interrogatories to
24 Willows; notice of Rule 30(b)(6) deposition of Willows; subpoena to produce
25 documents on non-party Absolute Collection Services, LLC; and subpoena to testify
26 at a deposition on non-party Absolute Collection Services, LLC.

27 To date, SFR has served the following discovery: initial disclosures; requests
28 for production to Chase; interrogatories to Chase; requests for admission to Chase;

1 and notice of Rule 30(b)(6) deposition of Chase.

2 To date Willows has served the following discovery: requests for production to
3 Chase; interrogatories to Chase; and requests for admission to Chase.

4 **B. Specific Description of Discovery that Remains to be Completed**

5 The parties are awaiting responses to the served discovery requests. In
6 addition, they are working to schedule party and non-party depositions. Chase has
7 scheduled the deposition of SFR for December 4, 2017, of Willows for December 4,
8 2017, and of Absolute Collection Services, LLC for November 22, 2017. SFR has also
9 noticed a Rule 30(b)(6) of Chase. As discussed below, however, the parties seek to
10 schedule Chase's deposition to occur after the current discovery cutoff of December 4,
11 2017.¹

12 **C. Good Cause Exists for the Requested Extension**

13 Good cause exists for the requested extension, as it will provide time for the
14 parties to complete written discovery and schedule depositions in a way that
15 minimizes burden and increases efficiency. SFR has served voluminous written
16 discovery requests on Chase. While Chase requires additional time to respond to
17 SFR's discovery, Chase's current response deadline December 4, 2017—*i.e.*, the last
18 day of the discovery period. SFR is willing to provide Chase with a two-week
19 extension for its responses, but it cannot do so unless discovery is extended.

20 Additionally, SFR has noticed Chase's deposition for November 29, 2017, but
21 Chase's Rule 30(b)(6) designee is unavailable on this date because the designee will
22 be testifying in five other depositions in similar lawsuits involving Chase and SFR,
23 on not only November 29 but also on November 28 and 30. The parties have met and
24 conferred about rescheduling the deposition in this lawsuit to take place during
25 December 12-14, 2017, when the Chase designee will be available and in Las Vegas.

26
27

¹ The parties further reserve their rights to meet and confer and, if necessary, engage
in motion practice regarding any discovery issues that may arise.
28

1 This approach will significantly minimize the cost and burden to the witness.
2 Moreover, scheduling the Chase deposition during this time period will also allow
3 SFR to obtain Chase's written discovery responses before deposing Chase, a logical
4 process that will enable SFR to conduct an efficient, productive, and targeted
5 deposition. SFR anticipates that it will be able to significantly limit the scope of the
6 deposition based on the responses to its written discovery.

7 Finally, this is the parties' first request to extend the standard, 180-day
8 discovery period in this case, and they seek only a brief 30-day extension. The
9 parties have diligently engaged in discovery to date and seek this extension in good
10 faith.

11 **D. Proposed Discovery Deadlines**

12 The parties request an order extending the close of discovery, the deadline to
13 file dispositive motions, and the deadline to file a pre-trial order by 30 days.

Event	Current Deadline ²	New Deadline
Close of Discovery	December 4, 2017	January 4, 2018
Dispositive Motions	January 3, 2018	February 5, 2018
Pre-Trial Order	February 2, 2018	March 2, 2018

19 *[continued on next page]*

27 ² See Scheduling Order, ECF No. 30.

1 This extension is reasonable and necessary given the good cause set forth above.

2 **IT IS SO STIPULATED.**

3 Dated: November 13, 2017

4 BALLARD SPAHR LLP

KIM GILBERT EBRON

5 By: /s/ Maria A. Gall

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19 *Attorneys for Defendant The Willows'*
20 *Homeowners Association*

22 **ORDER**

23 **IT IS SO ORDERED:**

25 
UNITED STATES MAGISTRATE JUDGE

27 DATED: November 28, 2017